

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

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|---------------------------------|---|---------------------|
| STEPHANIE LYNN FORD, | : | |
| | : | |
| Plaintiff, | : | C.A. No. 06-301-MPT |
| | : | C.A. No. 07-529-MPT |
| v. | : | C.A. No. 06-458-MPT |
| | : | |
| CHRISTIANA CARE HEALTH SYSTEMS, | : | |
| | : | |
| Defendant. | : | |

**DEFENDANT'S OPPOSITION
TO PLAINTIFF'S MOTION OF MARCH 28, 2008**

For the reasons set forth below, Defendant Christiana Care Health Systems ("Defendant" or "Christiana Care") respectfully requests that Plaintiff's Motion of March 28, 2008 be denied.

1. To date, Plaintiff has filed three separate civil actions against Defendant in this Court, all relating to her employment with, and termination from, Christiana Care. The first two, Civil Action No. 06-458 and Civil Action No. 06-301, were consolidated by Order dated October 3, 2006 and then assigned to the Honorable Mary Pat Thyng.

2. On September 4, 2007, Plaintiff filed her Complaint in Civil Action No. 07-529. On February 8, 2008, Defendant filed its Motion to Consolidate Civil Action No. 07-529 with Civil Action Nos. 06-301 and 06-458. Additionally, Defendant requested that Civil Action No. 07-529 also be assigned to Judge Thyng. Plaintiff did not file an opposition to Defendant's Motion.

2. On March 18, 2008, Judge Farnan granted Defendant's Motion and consolidated Civil Action No. 07-529 with Civil Action Nos. 06-301 and 06-458 and assigned the case to Judge Thyng.

3. On March 28, 2008, Plaintiff filed a document entitled “Response Thereto, March 18, 2008 Order.” The nature of Plaintiff’s filing is unclear. Nevertheless, she requests that consolidation of (only) Civil Action Nos. 06-301 and 06-458 be reversed, that Judge Thyng be removed from these two cases, and that the cases be reassigned to Judge Farnan as two separate actions.

4. Despite the fact that Plaintiff’s reconsideration request of this Court’s October 3, 2006 Order is clearly time-barred, it still should be denied. Rule 42(a) of the Federal Rules of Civil Procedure gives the district court broad discretion to consolidate actions involving a common question of law or fact when such consolidation will promote convenience and economy in judicial administration. See Fed. R. Civ. P. 42(a); Honeywell Int’l Inc. v. AudioVox Comm. Corp., et al., Nos. 04-1337, 04-1338, 04-1538, 2005 WL 2465898, at *4 (D. Del. May 18, 2005); D’Alessandro v. United States of Am., Nos. 04-137, 04-616, 2005 WL 984352, at *1 (D. Del. Apr. 27, 2005).

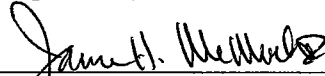
5. Consolidating these Civil Actions fosters judicial economy, as all three of these cases are indisputably related. They involve the same parties and the same factual and legal allegations. Consolidation of these actions avoids unnecessary duplication of effort and will not prejudice Plaintiff.

6. Moreover, Judge Thyng is already familiar with these cases as a result of her conducting of conferences with the parties with regard to scheduling and discovery matters. In addition, Defendant’s Motion for Summary Judgment, which Defendant incorporated into its Motion to Dismiss in Civil Action No. 07-529, is currently pending before Judge Thyng. Thus, Defendant believes that the interests of judicial economy are best served by continued consolidation of these three cases before Judge Thyng.

7. Plaintiff provides no valid, legal basis for her requests. Rather, Plaintiff uses this filing only as an opportunity to complain about stale discovery disputes that are nearly two years old.

WHEREFORE, for all the foregoing reasons, Defendant respectfully requests that Plaintiff's Motion of March 28, 2008 be denied.

Respectfully submitted,



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Dated: April 7, 2008

Attorneys for Defendant

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v.

CHRISTIANA CARE HEALTH SYSTEMS,

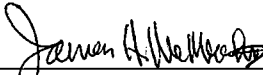
Defendant.

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CERTIFICATE OF ELECTRONIC SERVICE

I hereby certify that on April 7, 2008, I electronically filed the attached
DEFENDANT'S OPPOSITION TO PLAINTIFF'S MOTION OF MARCH 28, 2008
with the Clerk of Court using CM/ECF, and that I have mailed by United States Postal
Service the document to the following non-registered participant:

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ORDER

AND NOW this _____ day of _____, 2008, upon
consideration of Plaintiff's Motion of March 28, 2008, and Defendant's response thereto,
it is hereby ORDERED that said Motion is Denied.

J.